

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

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| In re Terrorist Attacks on September 11, 2001 | 03 MDL 1570 (GBD) (SN)<br><br>ECF Case |
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This document relates to:

*Federal Insurance Co., et al. v. Al Qaida, et al.*, Case No. 03-cv-06978  
*Thomas Burnett, Sr., at al. v. Al Baraka Inv. & Dev. Corp., et al.*, Case No. 03-cv-09849  
*Estate of John P. O'Neill, Sr., et al. v. Al Baraka, et al.*, Case No. 04-cv-01923  
*Continental Casualty Co., et al. v. Al Qaeda, et al.*, Case No. 04-cv-05970  
*Cantor Fitzgerald & Co., et al. v. Akida Bank Private Ltd., et al.*, Case No. 04-cv-07065  
*Euro Brokers, Inc., et al. v. Al Baraka, et al.*, Case No. 04-cv-07279

**DECLARATION OF J. SCOTT TARBUTTON IN SUPPORT OF PLAINTIFFS'  
MOTION TO COMPEL DEFENDANT DUBAI ISLAMIC BANK TO  
COMPLY WITH THE COURT'S MARCH 22, 2016 ORDER**

J. Scott Tarbutton affirms, under penalty of perjury, as follows:

1. I am an attorney admitted to practice *pro hac vice* in the above-captioned matter, and a member of the law firm Cozen O'Connor. I submit this Declaration to transmit to the Court the following documents submitted in support of Plaintiffs' Memorandum of Law in Support of Plaintiffs' Motion to Compel Defendant Dubai Islamic Bank to Comply with the Court's March 22, 2016 Order.

2. Attached hereto as Exhibit A is a true and correct copy of Plaintiffs' First Set of Requests for Production of Documents Directed to Dubai Islamic Bank, dated October 15, 2010.

3. Attached hereto as Exhibit B is a true and correct copy of Plaintiffs' Supplemental Requests for Production of Documents to Dubai Islamic Bank, dated July 31, 2012.

4. Attached hereto as Exhibit C is a true and correct copy of Plaintiffs' Second Set of Supplemental Requests for Production of Documents Directed to Dubai Islamic Bank, dated March 21, 2016.

5. Attached hereto as Exhibit D is a true and correct copy of Plaintiffs' July 14, 2015 Motion to Compel (Plaintiffs' Letter Brief #1) (ECF No. 2973).

6. Attached hereto as Exhibit E is a true and correct copy of Plaintiffs' July 14, 2015 Motion to Compel (Plaintiffs' Letter Brief #2) (ECF No. 2974).

7. Attached hereto as Exhibit F is a true and correct copy of Plaintiffs' December 11, 2015 Reply Motion to Compel (ECF No. 3164).

8. Attached hereto as Exhibit G is a true and correct copy of the March 22, 2016 Discovery Hearing Transcript of Record.

9. Attached hereto as Exhibit H is a true and correct copy of the October 10, 2016 letter from J. Scott Tarbutton, Esq. to Steven T. Cottreau, Esq.

10. Attached hereto as Exhibit I is a true and correct copy of the January 4, 2017 letter from Steve Cottreau, Esq. to Sean Carter, Esq.

11. Attached hereto as Exhibit J is a true and correct copy of the May 6, 2016 letter from J. Scott Tarbutton, Esq. to Steven T. Cottreau, Esq.

12. Attached hereto as Exhibit K is a true and correct copy of the September 29, 2016 letter from J. Scott Tarbutton, Esq. to Steven T. Cottreau, Esq.

13. Attached hereto as Exhibit L is a true and correct copy of the March 8, 2017 email correspondence from J. Scott Tarbutton, Esq. to Steven T. Cottreau, Esq.

14. Attached hereto as Exhibit M is a true and correct copy of the April 21, 2017 letter from J. Scott Tarbutton, Esq. to Katie Barlow.

15. Attached hereto as Exhibit N is a true and correct copy of the June 2, 2017 letter from J. Scott Tarbutton, Esq. to Katie Barlow.

16. Attached hereto as Exhibit O is a true and correct copy of the June 8, 2017 letter from J. Scott Tarbutton, Esq. to Steven T. Cottreau, Esq. and Katie Barlow.

17. Attached hereto as Exhibit P is a true and correct copy of the August 3, 2017 letter from J. Scott Tarbutton, Esq. to Steven T. Cottreau, Esq.

18. Attached hereto as Exhibit Q is a true and correct copy of the September 22, 2017 letter from J. Scott Tarbutton, Esq. to Steven T. Cottreau, Esq.

19. Attached hereto as Exhibit R is a true and correct copy of the October 11, 2017 letter from Steven T. Cottreau, Esq. to J. Scott Tarbutton, Esq. and Sean Carter, Esq.

20. Attached hereto as Exhibit S is a true and correct copy of an excerpt from the transcript of the August 3, 2017 Videotaped Deposition of Dr. Hussein Hamid Hassan, pp. 245-247, 265-266.

21. Attached hereto as Exhibit T is a true and correct copy of the August 14, 2017 letter from Steven T. Cottreau, Esq. to Sean Carter, Esq. and J. Scott Tarbutton, Esq.

22. Attached hereto as Exhibit U is a true and correct copy of the August 11, 2016 letter from Steven T. Cottreau, Esq. to Sean Carter, Esq. and J. Scott Tarbutton, Esq.

Executed in Philadelphia, Pennsylvania on October 30, 2017.

/s/\_\_\_\_\_  
J. Scott Tarbutton, Esq.